

1 MICHELE BECKWITH  
2 Acting United States Attorney  
3 CHRISTINA MCCALL  
4 ROGER YANG  
5 Assistant United States Attorneys  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

6 Attorneys for Plaintiff  
United States of America  
7  
8

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 BRADLEY EARL REGER,  
15 Defendant.

CASE NO. 2:23-CR-00177-TLN  
STIPULATION TO RESET STATUS  
CONFERENCE AND EXCLUDE TIME PERIODS  
UNDER SPEEDY TRIAL ACT; FINDINGS AND  
ORDER

16  
17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for a status conference and motion hearing on  
21 January 31, 2025. On January 27, 2025, the Court vacated the motion hearing, took the motion under  
22 submission, and vacated the status conference, ordering the parties to submit a stipulation and proposed  
23 order to reset the status conference. ECF No. 84.

24 2. By this stipulation, the parties request to continue the status conference until May 1,  
25 2025, at 9:30 a.m., and to exclude time between January 31, 2025, and May 1, 2025, under Local Code  
26 T4. Counsel for the defendant indicate that May 1 is the earliest date when both counsel are available  
27 for this status conference.

28 3. The parties agree and stipulate, and request that the Court find the following:

1           a)       The government has represented that the discovery associated with this case  
2 includes 378,000 pages of both protected and unprotected discovery such as investigative reports  
3 and audio/video files. All of this discovery has been either produced directly to counsel and/or  
4 made available for inspection and copying.

5           b)       Counsel for defendant desire additional time review the discovery, develop the  
6 case, conduct investigation, consult with their client, discuss legal strategies, and to explain the  
7 potential consequences and possible sentencing ramifications.

8           c)       Counsel for defendant believe that failure to grant the above-requested  
9 continuance would deny them the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11          d)       The government does not object to the continuance, given the stated availability  
12 of counsel for the defense.

13          e)       Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendant in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16          f)       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of January 31, 2025 to May 1, 2025,  
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
19 because it results from a continuance granted by the Court at defendant's request on the basis of  
20 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
21 of the public and the defendant in a speedy trial.

22        ///

23        ///

24        ///

25        ///

26        ///

27        ///

28        ///

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

## IT IS SO STIPULATED.

Dated: January 31, 2025

**MICHELE BECKWITH  
Acting United States Attorney**

Dated: January 31, 2025

/s/ KRESTA DALY  
KRESTA DALY  
Counsel for Defendant  
Bradley Earl Reger

## ORDER

IT IS SO FOUND AND ORDERED this 31<sup>st</sup> day of January, 2025.

Troy L. Nunley  
Chief United States District Judge